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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

INNOVATIVE SPORTS MANAGEMENT,)
INC.,)
Plaintiff,)
vs.)
RENZO MACCHIAVELLO, individually)
and d/b/a RENZO’S TASTE OF PERU; and)
MACCHIAVELLO, LLC, an unknown)
business entity d/b/a RENZO’S TASTE OF)
PERU,)
Defendants.)
JURY TRIAL DEMANDED)

Case No.: 8:12-cv-01748-DOC-RNB
**ANSWER OF DEFENDANTS RENZO
MACCHIAVELLO AND
MACCHIAVELLO, LLC d/b/a RENZO’S
TASTE OF PERU**
DEMAND FOR JURY TRIAL
*[Pursuant to Federal Rules of Civil Procedure,
Rules 8(b), 12(a), 38]*

COME NOW defendants Renzo Macchiavello and Macchiavello, LLC d/b/a Renzo’s Taste of Peru
(collectively referred to as “defendants” herein), appearing by counsel, and file this Answer and
Defenses in response to the Complaint of plaintiff Innovative Sports Management, Inc.

AND NOW, the defendants answer the Complaint, paragraph by paragraph, as follows:

1. Admit.

- 1 2. Admit.
- 2 3. Admit that there is personal jurisdiction only.
- 3 4. Admit that venue is proper.
- 4 5. Admit that intradistrict assignment is proper.
- 5 6. Defendants are without sufficient information to admit or deny.
- 6 7. Defendants cannot admit or deny because the allegation is compound, and vague
- 7 and ambiguous as to time.
- 8 8. Admit.
- 9 9. Deny.
- 10 10. Deny.
- 11 11. Deny.
- 12 12. Deny.
- 13 13. Deny.
- 14 14. Defendants cannot admit or deny because the allegation is compound, and vague
- 15 and ambiguous as to time.
- 16 15. Deny.
- 17 16. Defendants are without sufficient information to admit or deny.
- 18 17. Defendants are without sufficient information to admit or deny.
- 19 18. Defendants are without sufficient information to admit or deny.
- 20 19. Deny.
- 21 20. Deny.
- 22 21. Deny.
- 23 22. Deny.
- 24 23. Deny.
- 25 24. Deny.
- 26 25. Deny.
- 27 26. Deny.

1 27. Deny.

2 28. Deny.

3 29. Deny.

4 30. Deny.

5 31. Deny.

6 32. Deny.

7 33. Deny.

8 34. Deny.

9 35. Defendants are without sufficient information to admit or deny.

10 36. Defendants are without sufficient information to admit or deny.

11 37. Deny.

12 38. Deny.

13 39. Deny.

14 40. Deny.

15 41. Deny.

16 42. Deny.

17 43. Deny.

18 In response to the paragraphs following paragraph 43, beginning with the words
19 “WHEREFORE, Plaintiff prays” the defendants deny plaintiff is entitled to the relief prayed for or
20 any relief whatsoever. Defendants hereby demand a jury trial in this civil action.

21 Respectfully submitted.

22 DATED: October 17, 2012

LAW OFFICE OF MATTHEW PARE, APC

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By: /s/ Matthew A. Paré

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Matthew A. Paré, Esquire
Counsel for Defendants Renzo
Macchiavello and Macchiavello, LLC
d/b/a Renzo’s Taste of Peru

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CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2012, I electronically filed the foregoing with the Clerk of the Court using the ECF System which sent notification of such filing to the following:

Thomas P. Riley, Esq., State Bar No.: 194706

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By: /s/ Matthew A. Paré

Matthew A. Paré, Esquire